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C-NAVY-03-02-1560W

March 27, 2002

Project Number N7397

Mr. James Shafer
Remedial Project Manager
Engineering Field Activity Northeast
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0269

Subject: Response to RIDEM Comments
Draft Final Preliminary Remediation Goals (PRGs) (November, 2001)
Old Firefighting Training Area, Naval Station Newport, Newport Rhode Island

Dear Mr. Shafer:

This letter has been prepared in response to correspondence from RIDEM dated March 5, 2002 commenting on the submittal referenced above. Responses to these comments are provided on Attachment A.

The subject document was submitted in November 2001, and EPA provided some minor comments approximately 30 days following that submittal. Due to the delivery schedules required by the EPA, the PRGs were considered final in January 2002 so that they could be used to direct the completion of the Draft Final Feasibility Study Report for this site. Final PRGs are provided as Appendix D to that report (TtNUS, March 2002). Therefore, we recommend a teleconference or meeting be held to discuss any outstanding issues with the PRGs in context with the recently released FS report.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

Stephen S. Parker
Project Manager

SSP:rp

Enclosure

c: M. Griffin, NETC (w/encl.)
K. Keckler, USEPA (w/encl.)
P. Kulpa, RIDEM (w/encl)
J. Stump, Gannett Fleming (w/encl.)
K. Finkelstein, NOAA (w/encl.)
C. Powell, RI F&W (w/encl.)
J. Trepanowski/G. Glenn, TtNUS (w/encl)
File N7397-3.2 (w/o encl.)

Attachment A
Responses to Comments from RIDEM:
Draft Final PRGs, Old Firefighting Training Area
Naval Station Newport, Newport Rhode Island

Comment 1) The following PRGs, will address marine ecological risk concerns associated with organic contaminants at the site (the Office of Waste Management is aware that a number of these PRGs were developed to address human health risk concerns):

2-Methylnapthalene	185 ppb
Acenapthylene	697 ppb
Benzo(a)anthracene	1338 ppb
Benzo(a)pyrene	134 ppb
Benzo(b)fluoranthene	1338 ppb
TPH	500 ppm

Response:

The list presented above is a mix of different PRGs, which were calculated to be specific to different exposures and different areas of the site. The different PRGs cannot simply have the lowest value selected for each compound nor can any single value be applied across the site: the PRGs calculated for human exposure to sediment apply only to the intertidal area, and PRGs calculated for ecological exposure apply only to the subtidal area. Finally, a sediment PRG was not calculated for TPH. Since this is not a risk based value, it is suggested that cleanup criteria for TPH be addressed as ARARs in the FS.

Comment 2) Due to SEM/AVS the Navy has not proposed ecological based PRGs for inorganic contaminants. SEM/AVS assumes static conditions, which may not be the case, as has been observed at McAllister Point Landfill. Therefore, the Office recommends that inorganic PRGs be applied to those sediments, which are likely to be disturbed during a severe storm event.

Response:

The comment is incorrect in that the SEM-AVS values used do not reflect static conditions, these values were actually measured values from the sampling conducted in the spring of 1998. Since they are measured values, they reflect the condition of SEM-AVS in the sediment during the sampling event, which is believed to be typical for the site. Additionally, they are measured to be well below the guideline of 5.0 umol/g (<1.0 for all but 2 stations). While oxygenation of the sediment during a storm event could raise the SEM-AVS in the disturbed sediment, this would be a short term occurrence, and the typical condition would likely revert to the measured value soon after that storm event.

Comment 3) Finally, as stated in previous correspondences, the Office of Waste Management does not concur with the proposed PRG process for the site or the associated supporting documents, such as, the human and ecological risk assessments. Rather than enter into dispute resolution the Office of Waste Management and the Navy have agreed to forgo approval of this PRG process and supporting documents. This has proven beneficial in that it has avoided delays in the project, allows for an expedited remediation of the site, and has resulted in cost savings that can be applied directly to this or other sites. The Office of Waste Management is confident that other novel, mutually agreeable, approaches, can be applied to other areas; and looks forward to working with the Navy in addressing the investigation and remediation of the NETC site.

Response:

Presuming there will be no RIDEM approval of the PRGs or the development process, it is recommended that the interested parties meet and discuss moving forward with the FS.